

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

JOINT MOTION FOR AN ORDER OF EXCLUDABLE DELAY

The United States of America, by Michael J. Sullivan, United States Attorney for the District of Massachusetts, and the Defendant, through his counsel Attorney Vincent Bongiorni, respectfully move for an order of excludable delay under the Speedy Trial Act, 18 U.S.C. §3161(h)(8). In support of this motion the government states that the Counsel for Defendant requires more time to meet with Defendant to determine whether the Defendant wishes to resolve this case short of trial. Defendant, through his counsel, has assented to the government's request to exclude this time.

It is in the best interests of the Defendant, the government, and the public, to exclude the time from February 22, 2005 until March 28, 2005, from the period within which the trial of this case must commence under the Speedy Trial Act.

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

By: s/s Paul Hart Smyth

Paul Hart Smyth
Assistant U.S. Attorney

CERTIFICATE OF SERVICE

Hampden, ss.

Springfield, Massachusetts
March 22, 2005

I, Paul Hart Smyth, Assistant U.S. Attorney, do hereby certify that I have served a copy of the foregoing by facsimile on March 22, 2005, to Attorney Vincent Bongiorni.

s/s Paul Hart Smyth
Paul Hart Smyth
Assistant U.S. Attorney